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12/6/2016

Honorable Vernon S. Broderick  
United States District Court for the  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 518  
New York, New York 10007

Re: Underdog Trucking, L.L.C. v. National Action Network et. al.  
SDNY Docket No. 16 Civ. 5654 (VSB)

Dear Judge Broderick:

We represent the Plaintiffs Reggie Anders and Underdog Trucking, L.L.C.

This is a request for extension of the pre-motion conference between the Plaintiff's Counsel and Counsel for National Action Network and Rev. Al Sharpton scheduled on Thursday, December 8, 2016 at 11:00 a.m. in Courtroom 518 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY. This conference is with respect to Mr. Michael Hardy's pre motion letter dated 10/31/2016.

On November 30, 2016, a similar letter was submitted by Raymond McGuire on behalf of Defendants Verizon Communications Inc. ("VCI") and Cellco Partnership d/b/a Verizon Wireless ("Verizon Wireless") in the above-referenced matter.

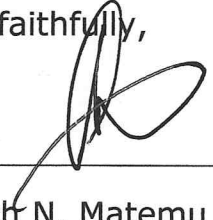
I am requesting for an extension up to Mid-January so that the court can handle both matters at the same time and also give me time to respond to the letter from Raymond McGuire.

The reason I am requesting a mid-January date is because I will be away overseas on a pre-scheduled trip from December 14<sup>th</sup> to the 27<sup>th</sup>.

I contacted all counsels for the defendants today by way of email and by follow-up phone calls but I have not heard from either of them at this time.

We thank the Court for its consideration of this matter.

Yours faithfully,



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Japheth N. Matemu Esq.

cc. Raymond McGuire

Michael Hardy